

KOLEKTOR

Code of conduct
for business
partners



KOLEKTOR is a global supplier that boasts a tradition of highly specialized industrial production and a synonym for credibility, trust, quality and innovative products and services in its three strategic groups: **Kolektor Mobility**, **Kolektor Technologies** and **Kolektor Construction**.

Our mission is to satisfy the expectations of our owners, business partners, and employees, as well as the environment with solutions to the technological challenges of the future and quest for new business opportunities. We live our values and we foster them through our work.

Business operation of Kolektor companies is ethical, legal, socially responsible and committed to sustainable development. We are taking action to promote prosperity and protect our planet by working towards the internationally agreed Sustainable Development Goals of the United Nations, by integrating the UN's strategic initiative of the Ten Principles of the Global Compact and by committing to an active approach to reducing greenhouse gas emissions and thereby mitigating climate change into our strategy, policies and operating procedures.

We want to encourage also you - our business partners and suppliers - to join us in this mission and cooperate with us to achieve these goals. This document is supposed to be both a guide and a commitment to act on all these principles in your organizations - to build better relationships, to implement fair business practices and to ensure a safe and healthy environment for a better tomorrow for all of us and for the generations yet to enter this world.

Idrija, June 18th 2025



Darja Petrič,

Member of the Board of Management

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Valter Leban,

President of the Board of Management

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Žiga Kogej,

Member of the Board of Management

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1. ENVIRONMENT

1.1. General expectations

Within the organization, a responsible attitude towards the environment, aimed at reducing the negative impacts resulting from the production and provision of services - at the suppliers, along the supply chain and upstream to the sources of raw material must be established and ensured.

1.2. Compliance with requirements and standards

The basic requirement is to comply with all relevant legislative, regulatory and permit requirements. Production companies are expected to implement and certify an Environmental Management System (ISO 14001 or comparable standard) and to continuously improve the environmental performance, as evidenced by appropriately set indicators (KPIs), resulting targets and activities and the timely and appropriate submission of all relevant environmental reports.

1.3. Use of advanced technologies

As far as possible and financially feasible, it is preferable to introduce best available techniques (BAT) and to use processes and materials that do not pose a significant risk to the environment and users and that have minimum negative impact on the environment during their operation.

1.4. Risks, training and emergency response

Risks need to be identified and assessed, as do the associated negative impacts on the environment. Through proactive action and training, the employees need to be made aware of the correct handling and consequences in the event of an emergency. Adequate fire protection and evacuation systems, and first aid should be provided. Adequate and effective method of communication with interested public must be established.

1.5. Biodiversity conservation, land use and deforestation, animal welfare

We need to be aware of the implications of our actions and the use of resources for biodiversity conservation. Where relevant, measures must be taken to reduce deforestation and change natural ecosystems in supply chains, while actively controlling the spread of non-native invasive species in our own territory. All applicable legislation related to animal welfare must also be observed - if this is relevant to the organization.

1.6. Sustainable resource management

Material resources for own production and operations must be managed economically and responsibly, ensuring that the proportion of recycled material resources is as high as possible - as far as this is feasible and acceptable in terms of quality and approved by the customer.

1.7. Efficient use of water and preservation of the quality of water resources

It is necessary to monitor the consumption of drinking water and other water for own use and (if possible) to take measures to reduce consumption and the amount of wastewater generated. All necessary measures must be taken within one's area of influence to prevent pollution of surface and groundwater, and wastewater from production processes must be regularly monitored and checked. Where possible and permitted, the share of reused water should be increased (e.g. wastewater from a process used again or for a different purpose).

1.8. Energy efficiency

The basic method of reducing the use of energy resources is to ensure energy efficiency. For buildings, machines, and equipment, it is necessary to monitor energy consumption and, based on the results, improve energy efficiency, with a focus on the largest energy consumers - furnaces, machines, compressed air systems, heating devices - and ensure that energy losses are prevented, and waste energy

is used, where feasible. The implementation of an energy management standard (ISO 50001) is also recommended.

1.9. Responsible use of chemicals

Only materials that comply with all legislative and regulatory requirements and specific requirements for the purchasing, storage, labeling, use, reporting and disposal of chemicals may be used in production processes, with the aim of reducing the proportion of hazardous chemicals. Employees must be adequately trained in the safe and responsible use of chemicals and provided with all necessary protective equipment and documentation. All necessary records of the content of substances in products (e.g. IMDS, REACH SVHC, RoHS, GADSL, POPs, etc.) must be provided to customers. Packaging must comply with the EN 13427 standard, and returnable packaging must be used as much as possible and feasible.

1.10. Maintaining air quality

It is necessary to ensure that emissions to air from all installations (including the vehicle fleet, heating systems and devices containing refrigerant gases) are properly monitored, that emissions to air comply with legal requirements, and that there are targets and activities to reduce these emissions.

1.11. Circular economy and waste reduction

The waste hierarchy principle must be respected, and waste must be managed responsibly and appropriately, hazardous waste in particular. Waste hierarchy:

1. Waste prevention - begins already in the product and process development phase and through regular and appropriate monitoring of operations.
2. Preparation for reuse - where feasible
3. Recycling of waste - either within own operations or by outsourcing for processing
4. Energy recovery of waste - if recycling is not possible, outsource to authorized energy recovery providers.
5. Waste disposal - disposal to authorized waste collectors with a waste disposal or incineration permit.

1.12. Maintaining soil quality

It is necessary to ensure that the quality of the soil within the area of influence is maintained - both in terms of appropriate site management, prevention of erosion, overgrowth and removal of invasive alien species, and in terms of prevention of environmen-

tal accidents (such as spills or leaks) and appropriate management should such an event occur.

1.13. Noise, radiation and other pollution

Noise pollution from own activities should be minimized, especially at night. The impact of electromagnetic and other radiations on the environment should also be minimized - if such devices exist and if feasible.

For other types of pollution that are not regulated and limited by legislation but can be influenced, it is expected that these impacts are minimized as well - e.g. odors and smells, vibrations and light pollution.

1.14. Climate change mitigation measures, carbon neutrality

We need to be aware of the impacts of climate change and to commit to actively participating in both adapting to its effects and mitigating its causes. Greenhouse gas emissions calculations must be provided and actions with defined timelines and targets must be taken to achieve carbon neutrality before 2050. Targets should cover both measures to reduce emissions through energy efficiency improvements and to reduce direct and indirect greenhouse gas emissions through a transition to low-carbon and renewable energy sources.

It is necessary to provide customers and other stakeholders (e.g. banks, government) with the required greenhouse gas emissions data, preferably verified by a third party, and to involve relevant subcontractors (if necessary). For all materials subject to the CBAM Directive, appropriate reporting must be provided within the prescribed deadlines.



2. SOCIAL ASPECT

2.1. Respect for human rights

A respectful, fair, and equal approach toward employees must be ensured by complying with legal requirements and adhering to the Universal Declaration of Human Rights and the standards of the International Labour Organization (ILO). Employment must be voluntary, and the rights to privacy, dignity, and personal integrity must be respected. Personal employee data must be stored in accordance with applicable legislation and internal regulations; withholding personal documents is not permitted. Disciplinary policies and procedures must be clearly defined and communicated to employees.

2.2. Employment ethics

The recruitment process must comply with legal requirements and standards. All candidates must be guaranteed equal conditions of employment and equal opportunities for promotion, without any form of discrimination or unfair treatment. There must be no discrimination in recruitment procedures based on gender, age, religion, race, disability, sexual orientation, national or ethnic origin, political beliefs, or any other characteristics unrelated to job performance. When using external employment agencies or intermediaries, it must be ensured that these organizations are also committed to ethical standards and that their practices do not contravene legislation or ethical recruitment policies.

2.3. Diversity, equality and inclusion, women's rights

Diversity must be respected — including gender, age, religious or political affiliation, refugee or migrant status, as well as education and experience, work limitations due to disability status, ways of thinking, and cultural background. An inclusive workplace culture must be fostered, where every individual feels valued, unique, and respected, and where their personal abilities and perspectives are acknowledged. The importance of gender equality must be recognized, and conditions must be ensured for balanced representation at all levels, positions, and within all work teams. Empowering women is essential for creating shared value for both the company and society at large.

2.4. Working hours

Employees' working hours must not exceed the maximum hours set by applicable legislation and the standards of the International Labour Organization. The provisions of labor law regarding breaks and overtime must be respected. When planning working hours, a suitable balance between private and work life should be considered as much as possible (e.g. flexible working hours where possible, shift swaps, taking leave during preferred periods, and the possibility of remote work – where reasonable and feasible).

2.5. Remuneration

All applicable laws and standards regarding wages and compensation must be observed, including all legal minimums and mandatory pay and reward schemes as defined by regulations and contracts. Fair and competitive wages must be ensured, following the principle of equal pay for equal work. The basis for remuneration must be clearly communicated, and wages, contributions, and any other payments must be paid regularly and on time. Wage deductions as a disciplinary measure are not permitted unless allowed by law.

2.6. Freedom of association and collective bargaining

Employees have the right to form associations and engage in collective bargaining. Cooperation between management and trade union representatives, as well as other employee representatives, must be ensured. Open dialog and honest feedback among employees at all levels must be encouraged, and the expression of opinions, suggestions and the raising of questions must be facilitated and encouraged.

2.7. Occupational safety and health

Safe working conditions must be ensured, and the establishment of an effective occupational health and safety system (such as ISO 45001) involving employees from all areas of work is encouraged. Continuous improvement of the working environment, adaptation to technological advancements, and prevention of negative impacts on health and safety must be ensured. All legal requirements must be met, risks must be periodically assessed, and programs must be planned and implemented to reduce risks, the severity and frequency of workplace accidents, as well as to prevent work-related illnesses and occupational diseases. Employees must be regularly trained across all work areas, provided with instructions for safe work in a language they understand, and the condition and operation of equipment and infrastructure must be properly monitored. Workplaces must be ergonomically designed, hygienic working conditions ensured, and proper management of work equipment and chemicals must be in place, including regular assessments of the work environment. Appropriate personal protective equipment must be provided, correctly used, and fit for its intended purpose. Preventive activities must be carried out and appropriate actions must be taken in case of emergencies.

2.8. Health promotion

Employees are encouraged to adopt a healthy lifestyle through various activities. Quality nutrition is provided, attention is given to their physical, mental, and social well-being, and joint consultations are held with employees and their representatives.

2.9. Education and training

Competent employees are the basis for a successful company. Therefore, regular training and development of employee competencies at all levels (production, administration, management) must be ensured, based on relevance and needs.

The training plan should include all aspects of requirements, not just those required by law.

2.10. Prohibition of forced labor and human trafficking

All forms of forced labor are strictly prohibited. Compliance with all applicable laws and regulations related to the prohibition of forced labor and human trafficking must be ensured. Employment must be freely chosen.

2.11. Prohibition of child labor

Child labor is prohibited. The standards of the International Labour Organisation (ILO Convention No. 138 and No. 182) must be observed. No person under the legal age of employment must be employed. If there is no minimum legal age limit for employment defined, the age of 15 years shall apply. Workers under the age of 18 may only perform work in accordance with legal requirements (e.g., regarding working hours and conditions).

2.12. Rights of minorities and other communities

Where relevant, the rights of indigenous peoples and other traditional groups must be safeguarded. For activities that could significantly impact land used or inhabited by indigenous or traditional communities, the provisions of ILO Convention No. 169 must be followed. The illegal eviction of communities from land during the acquisition, development or other use of land, forests and water is strictly prohibited.

2.13. Prohibition of discrimination and harassment

There must be zero tolerance of harassment or discrimination of any kind. An effective system must be in place to report and address any violations related to discrimination or harassment in the workplace. Discrimination based on skin color, ethnic origin, nationality, age, gender, sexual orientation, religious affiliation, personal beliefs, political or trade union activity is strictly prohibited.

2.14. Operation of the security service

If the organization has its own or contracted security personnel, it must ensure that they are properly trained regarding the prohibition of harassment, abuse, punishment, or any other form of violence in the workplace.



3. GOVERNANCE

3.1. Integrity and prevention of corruption

The requirements of national and international legislation related to integrity and the prevention of corruption must be known and implemented. It is prohibited to solicit, receive, offer, or grant any undue advantages or other benefits that would conflict with moral standards. Any act of corruption must be reported.

3.2. Avoiding conflicts of interest

Conflicts between financial or other interests and professional duties must be avoided. Where this is not possible, such situations must be disclosed and appropriately addressed.

3.3. Competition protection and anti-trust policy

Participation in any practices that violate competition protection and anti-trust laws is strictly prohibited. This includes the formation of cartels or engaging in coordinated actions intended to distort competition, as defined by antitrust laws. A zero-tolerance policy toward fraud must be ensured.

3.4. Whistleblower protection

A system must be in place that enables the reporting of improper practices in all areas of business operations. The identity of whistleblowers acting in good faith must be protected, and they must be safeguarded against any form of retaliation.

3.5. Customs and export regulations and economic sanctions, taxes

It is essential to comply with tax and customs legislation, as well as restrictions on the import, export, and trade of goods, services, knowledge, software, and technology from prohibited countries, regions, companies, entities, or individuals. Upon request from a customer, all checks and information related to business relations with the customer must be provided promptly.

3.6. Principles of preparing financial reports

Financial reports must be based on accurate and complete accounting records containing all financial transactions. Accounting must be conducted in accordance with accepted accounting standards, relevant laws, and other applicable regulations. The quality characteristics of financial reports – understandability, relevance, reliability, and comparability – must be strictly observed. Any incorrect, incomplete, misleading, or fictitious accounting records and resulting financial statements are strictly prohibited and unacceptable.

3.7. Prevention of money laundering and terrorist financing

Relevant legal requirements and best practices for the prevention of money laundering and the financing of terrorism must be understood and implemented. Any financial transactions that may reasonably be suspected of being related to money laundering must be reported to the appropriate authorities.

3.8. Protection of data and insider information

Information systems that contain confidential or sensitive data must be appropriately managed and protected against unauthorized access, use, disclosure, modification, or destruction.

Such data must be used solely for legitimate business purposes, in a transparent and secure manner, and shared only with authorized personnel who need it for their work—and only for as long as necessary.

Insider information which, if it became public knowledge, could have a significant effect on the price of listed securities must be treated with strict confidentiality and must not be used for trading in securities or other financial instruments or for any other purpose prohibited by law, nor must it be communicated to third parties.

3.9. Cyber security

Appropriate and effective cybersecurity measures must be implemented in accordance with applicable laws, regulations, and industry standards to protect the confidentiality, integrity, and availability of data and IT systems. Comprehensive cybersecurity assessments must be carried out to protect critical IT systems and sensitive information from unauthorized access, prevent security breaches, and maintain confidentiality. Implementation and certification according to TISAX or ISO 27001 are recommended, as well as regular employee training on ensuring information security.

3.10. Data integrity

Products or services must be designed, manufactured, and tested to be suitable for use based on accurate, reliable, and complete data. Respect for all data usage rights, including the scope of permissions or licenses, must be ensured. Best and verified practices for sharing the data between companies must be adopted.

3.11. Business continuity and contingency plan

Based on risk assessments, a business continuity and contingency plan must be established and tested regularly to minimize operational disruptions. The plan must also include measures for protecting employees, the environment, machinery, and IT systems in emergency situations.

3.12. Responsible sourcing of conflict minerals and critical raw materials

A responsible supply chain must be ensured for specific materials that, while not inherently problematic in terms of risk to the environment or users (conflict materials), may be ethically questionable in terms of their location and method of extraction, as they have been linked to violence in Central Africa and other parts of the world (CAHRAS), as well as to the exploitation of child labor and the local community exploitation. It is necessary to do business exclusively with suppliers that meet the responsible sourcing standards set by the Organisation for Economic Co-operation and Development (OECD) and to exercise due diligence in requesting all necessary information, declarations and other documents proving the origin of the materials - if such materials are used (e.g. RMI).

3.13. Technical compliance

Products must comply with agreed technical specifications, current legislation, standards, and other applicable requirements to ensure proper functioning and avoid adverse impacts on users and the environment throughout the product life cycle.

3.14. Intellectual property and counterfeit parts

Intellectual property rights and trade secrets of customers and other business partners must be respected. The inclusion of counterfeit parts or materials in products must be prevented through appropriate controls.

Confidential information and intellectual property of the customers and other business partners must be protected and used only in the agreed and appropriate manner.

3.15. Due diligence and responsible sourcing

Due diligence of direct suppliers and subcontractors must be conducted in line with the OECD Due Diligence Guidance for Responsible Business Conduct, appropriate to their size and circumstances, in order to promote transparency and traceability. Transfer of Code requirements to sub-suppliers
The requirements of this Code must be communicated up the supply chain to suppliers and sub-suppliers, with effective communication and compliance monitoring ensured.

3.16. Reporting of misconduct

We encourage all Kolektor business partner to report any suspected violation of obligations arising from this Code of Conduct, applicable laws, or other regulations, and to actively support efforts to clarify and resolve such matters.

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